

REMARKS

Amendments to the claims

Claims 12, 13, 18, and 28 are pending in the present application. With this response, Applicant amends claims 12, 18, and 28. Support for the amendments to claim 12 can be found, by way of example and not of limitation, on page 12, lines 1-4, of the application as filed. Support for the amendments to claim 18 can be found, by way of example and not of limitation, on page 7, lines 25-27, and page 10, lines 34-36, of the application as filed. Support of the amendments to claim 28 can be found, by way of example and not of limitation, on page 7, lines 25-27 of the application as filed. All amendments are made herein without prejudice.

Claim Rejections – 35 USC § 102(e)

Claims 12 and 13

In the Office Action, the Examiner rejects claims 12 and 13 as being anticipated by U.S. Patent 6,928,457 to Jacobs et al. (hereafter “Jacobs”).

Applicants submit that amended claim 12 is not anticipated by Jacobs. Applicants note that the Examiner addresses the features of claim 12 in section 11 of the Action by making reference to i) a name tree (column 5, lines 7-10 of Jacobs), ii) a JNDI-compliant naming service/server 302 (column 14, lines 23-47 of Jacobs), iii) the presence of the term ‘duplicate’ (column 5, lines 7-10 of Jacobs), and iv) a replicated naming service/server 303 (column 14, lines 23-47).

Applicants respectfully disagree with the Examiner and note that amended claim 12 recites that *“the first and second servers compris[e] means to migrate IP addresses and/or sockets for carrying the request from the first server to the second server in the event of a fault associated with the first server.”* In Jacobs, when one of the two servers does not work, there is merely switching by the client (or the object server) to the other server, without any kind of migration occurring between those servers. For example, column 14 lines 31-33 of Jacobs address addition of an RA stud from servers to the provider and not between servers. “Switching” is simply

changing from one server to another – establishing a new connection. “Migration” is performed by the servers so that the change is seamless from the perspective of the client – the IP address and socket data is migrated from one server to the other.

Moreover, amended claim 12 also recites that the servers are operated in “*active*” and “*stand-by*” modes. Where is this kind of operation shown in Jacobs?

In addition, Applicants have not been able to find where, in Jacobs, the feature “*the object server being arranged to supply the access data to the first object registry*” is disclosed and the Examiner made no such showing in his rejection.

Therefore, amended claim 12 is novel over Jacobs, together with claim 13, at least by virtue of its dependence on claim 12. The Applicants respectfully request that the Examiner withdraw the rejections against claims 12 and 13.

Claims 18 and 28

In the Office Action, the Examiner rejects claims 18 and 28 as being anticipated by U.S. Pub. 2000/099970 to Zhao et al. (hereafter “Zhao”).

Claim 18 recites that the intermediate registry comprises “*means to receive the access data from the object server.*”

Applicants submit that claim 18 is not anticipated by Zhao. Applicants note that the Examiner addresses claim 18 in section 17 of the Action by making reference to i) a binding...binding interceptor...bind method (page 3, paragraphs 0035/0036 of Zhao), ii) an alternative server (page 3, paragraphs 0035/0036 of Zhao), and iii) ...return...(page 3, paragraphs 0035/0036, Figures 5/6, page 3, paragraphs 0040/0041 of Zhao).

Applicants respectfully disagree with the Examiner and note that amended claim 18 recites three different entities associated with the claimed intermediate registry server: 1) an object server; 2)

a first object registry and 3) a second object registry. To the contrary, even assuming, *arguendo*, that the 'bind interceptor' in Zhao is indeed an intermediate registry server (which is not, because Zhao clearly states that the 'bind interceptor' is a Java class, see line 10 of paragraph [0034] in Zhao), such interceptor is only associated to an object server and to an alternative object server, in stark contrast with claim 18 where association is with an object server, a first object registry and a second object registry as recited above.

The above argument also applies to the rejection of claim 28, as claim 28 also recites those three different entities associated with the claimed intermediate registry server.

Further, regarding claim 18, the claim recites "*means to receive a request from a client computer for access data associated with an object accessible via an object server.*" The computer in Zhao that the Examiner refers to is the client and therefore would be unable to "*receive a request from a client computer*" or to be "*forwarding the access data ... to said client computer.*" In other words, the claim describes the intermediate registry server between a client and object server while Zhao only describes a client and a cluster of object servers, with no intermediate registry server. Therefore Zhao does not teach or suggest the above limitation of claim 18.

Claim 28 also makes it clear that there is a three-tier structure of client-intermediate-object machines as it recites "*receiving at least a first request for access data from a client computer*" and "*mapping the first request for access data for a remote object to a first remote object registry hosted by first server operating in active mode.*" Zhao could not map any requests as the requests are sent directly to each object server in the cluster once they receive the object reference. See e.g. Zhao paragraph [0032], which states "When a client invokes a cluster located under a particular context or specific directory, i.e. "resolves," a load balance is performed to return an object reference which was previously bound to the cluster. The client may then communicate with the server associated with the object reference which was selected." Therefore, Zhao does not teach or suggest the above limitation of claim 28.

Therefore, the Applicants respectfully request that the Examiner withdraw the rejections against claims 18 and 28.

The Commissioner is authorized to charge any additional fees which may be required or credit overpayment to deposit account no. 08-2025. In particular, if this response is not timely filed, then the Commissioner is authorized to treat this response as including a petition to extend the time period pursuant to 37 CFR 1.136(a) requesting an extension of time of the number of months necessary to make this response timely filed and the petition fee due in connection therewith may be charged to deposit account no. 08-2025.

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Respectfully submitted,

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Signature

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